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ADRA – Adventist Development and Relief Agency Independent Review Panel Feedback

Accountability Report 2018

Review Round December 2019



ADRA International

Feedback from the Independent Review Panel

Review Round December 2019

13 January 2020

Dear Michael Kruger,

Thank you for ADRA's accountability report, which was submitted to us by then-ADRA President Jonathan Duffy. We, the Independent Review Panel of Accountable Now, appreciate ADRA's efforts to strengthen accountability to communities, local partners, supporters, staff, donors, or other key constituencies. Our key focus is on accountability to those you serve. It is against this background that we critically discussed your report and came to the individual assessment below.

ADRA's second accountability report presents a significant improvement from their first report, both in terms of the information provided and how this information is presented. The Panel appreciates that ADRA has followed the reporting questions and used the self-assessment scoring in this report, which has led to greatly improved readability and allowed us a much stronger understanding of accountability within the organisation.

ADRA's approach to minimising fraud and corruption (I3) is identified as a **good practice**. Further **strengths** in this report include the introduction of ADRA's Accreditation and Licensing process, which is expected to increase accountability and unity across the entire ADRA Network, the overview of key likes and dislikes from stakeholders (E3), safe working environment (H3) and resource acquisition (I1).

Areas for improvement are: the need for more details on ADRA's approach to inclusivity, human rights and gender equality (C3), how ADRA minimises negative impacts on its stakeholders (C4), and how ADRA works in partnerships (D3). There is also a need to further improve clarity and accessibility of information about complaints mechanisms (J3 and J4), though the Panel notes this is something ADRA is already aware of and working on. The Panel also repeats its encouragement of ADRA to make more documents and policies publicly available on its website.

Overall, the Panel commends ADRA's marked improvement in this second accountability report and appreciates the openness and self-reflection in identifying points for improvement. We look forward to continuing to work with you on accountability issues.

We look forward to discussing our feedback with you in a follow-up call, which the Secretariat will be in touch to schedule. This conversation will form the basis for your



response letter, which will be made publicly available on the Accountable Now website along with your report and this feedback letter.

If you have any other feedback or comments on our work, please share them with us by sending them to the Accountable Now Secretariat.

Yours sincerely,

Accountable Now's Independent Review Panel





ADRA International's Accountability Report 2018

Review Round December 2019

Opening Statement from the Head of Organisation

ADRA's second accountability report opens with a strong statement from President Jonathan Duffy, highlighting key accountability related developments from 2018. These include strengthening of capacities around protection/safeguarding, finance, and advocacy.

Another key point is the introduction of an accreditation and licensing process (AAL) for all ADRA offices. The Panel is pleased to read that the AAL process was built on extensive consultation across ADRA, with input from five specialist working groups. We are interested in following the implementation of the AAL, and believe ADRA's experience here will be of interest to other AN members. The panel advises ADRA to do process documentation of this experience in order to closely chronicle such experience.

The statement also acknowledges the governance challenges ADRA faces due to the diverse nature of country board chairs (these are the Adventist Church leaders for each country). ADRA has responded to this by establishing management committees at Division level. ADRA is also exploring whether a new franchise-type governance model might be most appropriate for the organisation.

Cluster A: Impact Achieved

A. The impact we achieve

A1	Mission statement and theory of change The report outlines ADRA's new purpose statement (adopted in 2018 to replace the previous mission statement) and theory of change.	4
A2	Key strategic indicators for success ADRA's five Change Goals are shared, and the report states that there are objectives and measures of success for each goal, with 37 success indicators in general. However, the actual indicators are not shared, which also makes it difficult to assess the following question. It would be interesting to know how country and regional offices contribute to the achievement of the goals, and whether progress against the indicators is measured at the international, regional, and/or country level.	2
A3	Progress and challenges over the reporting period	2



	<p>The report states that a progress report on the Measures of Success is expected to be ready in time for ADRA's next accountability report. There are working groups which support the achievement of each of the five Change Goals and monitor progress. The working groups and regional offices are collecting data from country offices to feed into the progress report. The Panel looks forward to an update on this in the next report.</p>	
A4	<p>Significant events or changes regarding governance and accountability</p> <p>The most significant development in 2018 was the development of ADRA's accreditation and licensing (AAL) system, which was formally launched in early 2019. The AAL is based on key standards such as the Global Standard for CSO Accountability and the Core Humanitarian Standard.</p> <p>The AAL system must be adopted by all country offices in order for them to maintain their links to ADRA, and it is expected that all offices will have undergone assessment under the AAL by the end of 2020. The Panel welcomes ADRA's efforts on this front, as this is expected to strengthen accountability practices throughout the Network. We look forward to reading more about the AAL system, including what works well and any challenges, in future reports.</p> <p>In 2018 ADRA also appointed a full-time Protection Officer, and a protection strategy will be developed in 2019.</p>	4
B. Positive results are sustained		
B1	<p>Sustainability of your work</p> <p>During projects, ADRA evaluates the strengthening of beneficiary capacity, introduction of improved approaches, and establishment of systems to ensure long-term outcomes. How frequently are these assessed? ADRA also has an exit strategy, which has helped better track progress and adapt strategies to improve the sustainability of results.</p> <p>ADRA usually does not evaluate the sustainability of its work beyond the end of projects. The report states that this is because these evaluations must be done 3-5 years after projects end to demonstrate true sustainability – is this not feasible due to lack of capacity, resources, or another reason?</p> <p>Some examples are provided which demonstrate how ADRA is working towards sustainable outcomes in different countries. The Panel appreciates</p>	3



	<p>these, and the more comprehensive information, as requested in the last feedback letter.</p> <p>In the next report, could ADRA share if and how it involves key stakeholders to ensure the sustainability of its work, apart from capacity building? E.g. are stakeholders engaged in developing and implementing programmes together with ADRA, and therefore likely to be more invested in continuing them after the end of the programme's life cycle? May we also know what steps are being undertaken to sustain financing for the projects beyond project periods?</p>	
B2	<p>Lessons learned in the reporting period</p> <p>The report states that all projects are regularly evaluated and lessons are identified and shared internally between projects, as well as externally with donors and partner organisations. Sharing is done through written reports and at presentations, and lessons are fed into the design of future projects.</p> <p>The report provides an example of three learnings from ADRA's Food Security Projects. The response would have been further strengthened by sharing how these lessons were shared between different projects, and what actions ADRA has taken in response. E.g. is ADRA trying to find new ways of retaining volunteers, or a different approach to transferring activities to government institutions?</p>	3
C. We lead by example		
C1	<p>Excellence on strategic priorities</p> <p>ADRA's strategic priorities are health, education, sustainable livelihoods, and emergency response. The report lists the number of grants and projects focused on its key priority areas - this information would have been strengthened by including a breakdown of financial investments in the funded projects. It also lists the relevant networks and alliances ADRA is part of.</p> <p>Here we are looking for more details about how ADRA's delivery of projects and membership in these groups demonstrates leadership and guidance to others. This is covered under the next question, with reference to ADRA's sharing of experiences at meetings and conferences, and the organisation of training programmes. The Panel appreciates the examples provided on these points. ADRA's sharing of lessons learned could also be referenced here.</p>	3



C2	<p>Expertise is recognised and welcomed by peers and stakeholders</p> <p>The report provides examples of external recognition of ADRA's expertise. The FAO and other development organisations have expressed interest in ADRA's Farmer Market School (FMS) approach, and the OFDA has recognised the results of ADRA's apiculture work in Yemen and requested further market analysis on this. In the next report, can ADRA also share any examples of their beneficiaries welcoming ADRA's expertise?</p>	3
C3	<p>Inclusivity, human rights, women's rights and gender equality</p> <p>The response to this question is very brief, stating that an analysis of all ADRA's projects has identified that ADRA practices inclusiveness and active promotion of human rights and gender equality. More details on this would have been welcome, with examples of what this looks like in practice - we would particularly like to flag that the response should focus on inclusivity beyond gender as well, such as disability, ethnic minorities, etc. The Panel requests this in the next report.</p> <p>The report states that ADRA does not have a policy that clearly sets out its commitment to human rights standards, gender equality, women's empowerment and inclusiveness, but that they plan to address this gap by the end of 2019. The Panel looks forward to an update on this in the next report.</p> <p>For now, this is identified as an area for improvement.</p>	2
C4	<p>Minimising negative impacts on stakeholders</p> <p>ADRA conducts careful identification and selection of its stakeholders and partners at the initial stages of engagement. This is stated to reduce the likelihood of negative impacts – how is this the case?</p> <p>Open and transparent communication when working together is also referenced – again, more information about how specifically this helps minimise negative impacts is requested in the next report.</p> <p>Finally, it is stated that ADRA ensures key stakeholders are well informed of the principles, standards and policies under which ADRA must ensure their protection, and how to communicate about breaches. These principles or policies were not listed here – though the Protection Policy is linked later in the report – and the Panel requests this (together with links) in the next report.</p>	2



	The next report should also share more details and examples of how the above mentioned points work in practice.	
C5	<p>Responsible stewardship for the environment</p> <p>In 2018 ADRA began working on a pilot project, which began in 2019 in four countries, with the aim of reducing emissions related to internal operations and projects. The two key objectives are to create awareness within ADRA on carbon neutrality in development projects, and the creation of a carbon reduction model and guide. The Panel looks forward to more details on this in the next report, with information on concrete actions being taken to reach these objectives.</p> <p>The report states that in many projects there are initiatives to protect and rejuvenate the environment. The Panel appreciates the example of how this is done in a project in Honduras.</p> <p>In the next report we would also like to see examples of how ADRA is working to reduce the environmental impact of its own operations, be it by reducing travel, promoting train/public transportation where possible, energy saving or recycling initiatives, double sided or grey printing in office, etc. More details from the carbon reduction model will be appreciated in the next report.</p>	3
Cluster B: Stakeholder Involvement		
D. Key stakeholders are identified with great care		
D1	<p>Key stakeholders and how they are identified</p> <p>The reports list ADRA's key stakeholders, which include the Seventh-Day Adventist Church, international partners, funders, national governments in countries where ADRA operates, and communities and beneficiaries where ADRA works.</p> <p>ADRA first identifies a need or problem and makes a plan to address it, and the planned response determines the stakeholders. The report also notes that during a project, and particularly in emergency-related projects, the key stakeholders can change in response to the context.</p> <p>Do stakeholders help identify one another? For example, do church or community leaders suggest people ADRA should work with and help? The Panel would also like to know how stakeholders are prioritised – when</p>	3



	there are so many people needing help, does ADRA focus particularly on children, women, or ethnic minorities, for example?	
D2	<p>Reaching out to those impacted or concerned by your work</p> <p>ADRA reaches out to stakeholders in different ways, adapting methods to ensure the most appropriate channel for each stakeholder. Methods range from face to face meetings and phone calls to written communication, newsletters, website and social media.</p> <p>More detail is requested in the next report, particularly with regard to beneficiaries and partners. How regularly are the face to face meetings held? Are there any other methods, such as surveys, special events, etc.?</p>	2
D3	<p>Maximising coordination with others operating in the same space</p> <p>The response is brief and focuses on how other actors tend to coordinate development programmes and humanitarian responses. Humanitarian responses are coordinated by governments and the UNOCHA. Development programmes are managed by national NGO forums, local government agencies, and other NGOs.</p> <p>There isn't however very much information about how ADRA specifically works in partnership with these groups, what their role in partnerships tends to be, and how they identify and engage with partner organisations (apart from when these are dictated by the government or other actors).</p>	2
E. We listen to, involve and empower stakeholders		
E1	<p>Stakeholder feedback</p> <p>The Panel appreciates that more detail has been provided on this question compared to the last report, with examples of specific methods used to gather feedback.</p> <p>With regard to donors and partners, ADRA makes use of formal meetings, conference calls, and forums to gather their feedback. Regular programmatic and financial reports, an annual survey to private donors, and social media channels all allow donors to engage, ask questions, and provide feedback.</p> <p>Reports are also made to the ADRA Board and to governments in the countries ADRA work in, providing relevant information and allowing questions and feedback to be raised.</p>	3



	<p>As for beneficiaries, the response provides information about complaints and feedback mechanisms and specific activities within projects, which allow people to provide feedback. An example of one of these activities is a post-distribution monitoring assessment, via household surveys, where beneficiaries can provide feedback on the distribution of kits.</p> <p>Some more information would have been welcome regarding other channels for beneficiary feedback – does ADRA have community meetings, regular check-ins on their projects with beneficiaries, surveys, consultations, etc?</p> <p>We also request information in the next report on how ADRA gathers feedback from internal stakeholders, particularly staff and volunteers.</p> <p>The report also states that there is room for improvement on evidence of stakeholders acknowledging that ADRA is good at listening and responding to feedback. There is more evidence with regard to donors and partners, but outcomes regarding beneficiary feedback are poorly documented. The Panel appreciates that ADRA has put together a working group to address this point, to review and streamline ADRA's complaints channels and ensure timely and effective responses.</p> <p>We would only recommend that ADRA consider that in future reports, the point of evidence should not be limited to complaints mechanisms, and can include examples of changes ADRA has taken in response to feedback, and how stakeholders have received these.</p>	
E2	<p>Stakeholder engagement</p> <p>The report explains how ADRA engages stakeholders prior to, during, and at the end of project implementation.</p> <p>Before project implementation, ADRA consults with local authorities, communities, and other humanitarian actors through cluster meetings and rapid needs assessments, to identify gaps and avoid duplication. Local Boards, with representatives from the Adventist Church, a key stakeholder, approve projects, and agreements of cooperation are signed with stakeholders who will be involved in implementation.</p> <p>More information is requested on how ADRA engages stakeholders during project implementation. The report states that programme monitoring is conducted through field visits and refers to complaints mechanisms, but we would want to know what engagement looks like during the field visits, and whether and how stakeholders are involved in implementing projects.</p>	3



	<p>Once projects have come to an end, ADRA and donors conduct a final evaluation survey. Final evaluation reports are produced, which look into impact, lessons learned, best practices and achievements. These are shared with local authorities in some cases. Are they also shared with the communities involved in the project?</p> <p>The response can be strengthened in the next report by providing some specific examples of how the processes described work in practice, and how stakeholder involvement may have shaped or changed ADRA's work.</p>	
E3	<p>Main likes/dislikes from stakeholders and organisation's response</p> <p>The report does a good job of sharing feedback ADRA tends to receive, both positive and critical.</p> <p>The most common positive feedback ADRA receives from stakeholders is that it works in remote locations where few others operate, reaching the most vulnerable people.</p> <p>ADRA often receives feedback from the Seventh-day Adventist Church which focuses on how ADRA's work is not entirely aligned with the Church's main objective of evangelism. The report explains how ADRA responds and justifies the work it does. A similar approach is taken to feedback from governments that ADRA is not working in areas or with populations that are governmental priorities.</p> <p>A more specific example is provided of positive and negative feedback from the UN Humanitarian funds in DRC, and how ADRA is working to strengthen policies and procedures in response.</p> <p>This is a strong response overall. In future reports the Panel would want to see some more detail on feedback from beneficiaries or communities ADRA works in (are there any other key pieces of feedback apart from the appreciation of ADRA working in remote locations?) as well as from internal stakeholders (staff/volunteers).</p>	3
E4	<p>People and partners have gained capacities that last beyond your immediate intervention</p> <p>The report states that this is addressed under question B1. Examples are provided of how beneficiaries' capacities have been strengthened.</p>	3
F. Our advocacy work addresses the root cause of problems		
F1	<p>Evidence regarding the root causes of the problems you address</p>	3



	<p>ADRA has an Advocacy Working Group which ensures resources are available to support the identification and collection of evidence of the root causes of problems, and their use for advocacy. In 2018 an Advocacy Framework and Advocacy Handbook were created, and trainings will be provided on these in future years. Can ADRA provide links to these documents in future reports?</p> <p>The report also explains how ADRA gathers evidence from beyond the ADRA network. Two examples are the Micah Australia network of 19 Christian justice and development agencies, which ADRA Australia is part of, and the global Adventist Church community with presence in 215 countries, which enables ADRA to identify and collect evidence at grassroots level.</p> <p>Finally, the report mentions ADRA's participatory advocacy approach, which facilitates the identification, confirmation and addressing of root issues of problems by affected communities. The Panel appreciates this approach and would welcome more information in the next report (are details provided in the Advocacy Handbook?) as well as an example, if possible – who in the community was involved and what roles did they play?</p> <p>Overall the Panel finds ADRA's advocacy approach to be strong.</p>	
F2	<p><i>Stakeholders support your advocacy work and value changes achieved</i></p> <p>As mentioned in the previous question, ADRA's participatory advocacy approach puts rights holders at the centre of advocacy efforts, from understanding their rights to advocating for them, on issues they themselves have identified as important. The Panel considers this to be a positive practice, and would welcome some more details or examples as mentioned above.</p> <p>ADRA also provides the people they work for with regular, accessible information about the rationale behind their advocacy work, their strategy for achieving advocacy goals, and information on how people can get involved. Can ADRA share any examples of people engaging with this information, and/or any feedback demonstrating that they support ADRA's advocacy efforts?</p>	2



G. We are transparent, invite dialogue and protect stakeholders' safety		
G1	<p>Availability of key policies and information on your website</p> <p>Information about ADRA's network and programmes and impact, finances, and their protection and privacy policies can be accessed on their website. More specific information relating to their work in a given year is available in their annual report.</p> <p>We could not find any information about ADRA's complaints mechanism on the website, and urge ADRA to include the relevant policy and a dedicated submission channel (separate from the general Contact Us form) online.</p> <p>We also recommend that ADRA make other policies available online. Whilst the report states that other policies are currently on the intranet, we believe that there would not be sensitive information which would prevent them from being made publicly available, and that the policies would be of interest to ADRA's external stakeholders.</p> <p>The Panel would recommend that the re-design of the website be grounded in the spirit of dynamic accountability ADRA has undertaken; allowing stakeholders to easily find policy documents and interact with ADRA.</p>	3
G2	<p>Pay scale, gender pay gap and top salaries</p> <p>ADRA's remuneration policies are in line with those of the Seventh-day Adventist Church, which state that wages should be fair, just and equitable. Each division of the Church sets their own salaries, as national contexts and economies differ. Since the remuneration policy does not differentiate between male and female staff, and as wages are set based on the position, qualifications, and experience of staff, the gender pay gap has not been analysed.</p> <p>The Panel suggests that ADRA consider looking into conducting a gender pay gap analysis, as in practice discrepancies tend to exist, even if policies suggest that salaries should not differ based on gender.</p> <p>The report provides the base salary range of the five most senior positions, and the ratio between highest and lowest base salaries.</p>	3
G3	<p>Ensuring privacy rights and protecting personal data</p> <p>ADRA has a privacy policy which explains the information it collects from visitors to the website, via email, and other channels, how information is</p>	3



	<p>kept secure, and how it deals with information about donors and children. The report highlights the key points of the policy.</p> <p>The Panel suggests that the policy could also include guidance on how people can check, amend, or remove their personal information from ADRA's systems, and refer to recent regulations such as GDPR and CCPA. Given the number of countries ADRA operates in, including key aspects of these regulations can help avoid possible future compliance issues.</p>	
G4	<p>Largest donors and their contributions</p> <p>The report lists ADRA's five largest contributions from private donors – all of whom wish to remain anonymous. It also explains how the anonymity of contributors is protected.</p> <p>ADRA accepts resources from those with similar values and strategic priorities, and does not accept gifts that are too restrictive to purpose. The panel is satisfied with this report and encourages ADRA to sustain this initiative in future reports.</p>	4
<h2>Cluster C: Organisational Effectiveness</h2>		
<h3>H. Staff and volunteers are enabled to do their best</h3>		
H1	<p>Recruitment and employment is fair and transparent</p> <p>The report explains that ADRA has a documented process which is followed for the recruitment of all staff – can this be linked/shared in the next report? A recruitment officer from HR assists with each recruitment to ensure a consistent and fair process, and detailed records are kept at each stage to allow a fair final analysis to select the best candidate.</p> <p>Some more information on equal opportunities would be welcome in the next report – is it stated in the recruitment process document or anywhere else that recruitment will not be negatively affected by an applicant's age, gender, ethnicity, etc.? Does ADRA have any targets regarding gender or local hires? We would also like to hear about any efforts to maintain the diversity in the workplace, eg. is there a diversity policy?</p> <p>The report provides information on the total number of employees, their contract type, gender, age, and ethnicity. The Panel notes positively that there is an almost exactly even split of male and female employees. In its next report, can ADRA combine some of the information to provide a picture of gender and ethnicity in leadership positions, for example? Furthermore, is similar data collected for other offices, to provide an</p>	3



	overview of staff composition globally? Is this something that might be collected during the accreditation process?	
H2	<p>Staff development</p> <p>The response states that ADRA invests in a significant training and development budget, and has a dedicated Capacity Development Adviser. To identify training needs and skill areas for improvement, an annual training analysis is conducted, and managers are regularly surveyed to gather data on staff development. Several staff events are held each year to focus on these areas.</p> <p>In the next report, can ADRA share some examples of these events, as well as what kind of training is provided? Is training conducted in-house or externally? Is training in person, or are there online training opportunities? Which issue areas have been the focus of training and development in the past year? And what percentage of staff usually undergo training in a given year?</p> <p>Finally, we would also like to know about the performance appraisal process. Are performance reviews conducted annually, with each employee? What does this process look like?</p>	2
H3	<p>Safe working environment</p> <p>ADRA's Protection Policy provides comprehensive information on the organisation's beliefs and operating principles (including non-discrimination and respect for differences), core protection principles, code of ethics, and prevention of sexual harassment and abuse. It also includes information on the complaints mechanism, including the Silent Whistle mechanism which allows anonymous reporting.</p> <p>The policy includes information on how it is to be disseminated to beneficiaries – can ADRA share how it ensures its staff are also aware of the policy, code of ethics, etc.?</p>	3
I. Resources are handled effectively for the public good		
I1	<p>Resources are acquired in line with your values, globally accepted standards and without compromising independence</p> <p>ADRA's processes to ensure resource acquisition is in line with their values and doesn't compromise independence appear sound. A Gift Acceptance Policy states that ADRA can refuse donations if they might compromise independence or come from a questionable source - the</p>	3



	Panel commends this. A Gift Acceptance Committee monitors adherence to the policy and can make recommendations to the ADRA International Finance Committee if necessary. ADRA also applies the Model Standards of Practice for the Charitable Gift Planner.	
12	<p>Monitoring of progress and re-allocation of resources</p> <p>The response states that the Board of Directors specifically reviews ADRA's progress against its mission and goals at three board meetings per year, and that the programmes, finance, and fundraising teams work together to ensure that funds are matched appropriately to projects and spent in accordance with funders' wishes. Some more information is requested here to better understand if and how ADRA can re-allocate resources if needed.</p>	3
13	<p>Minimising risk of corruption, bribery and misuse of funds</p> <p>ADRA's approach to mitigating the risk of fraud and corruption seems strong. The report outlines the four key elements of the approach: review of policies and investigation of allegations by the Board and its Audit Committee, policies and procedures including a Fraud Policy (we encourage ADRA to provide a link to this), a conflict of interest declaration, Code of Ethical Conduct and training for staff, and financial controls.</p> <p>The report also explains that an Internal Audit Unit conducts investigations if controls should fail, and prepares a report with recommendations of actions to be taken.</p> <p>The Panel notes positively that ADRA held a Finance Summit in 2018, with 105 participants from across the network. Workshops on fraud, financial sustainability and cost recovery were provided in both English and Spanish, as well as a training for trainers.</p> <p>Overall, ADRA's approach to this issue is seen as a good practice to be shared with other members.</p> <p>In future reports, the Panel requests that ADRA mention whether there were any incidents in the reporting period and what action has been taken in response, e.g. more trainings, changing processes.</p>	4
J. Governance processes maximise accountability		
J1	<p>Governance structure and recruitment of trustees/board members</p> <p>A detailed overview of ADRA's governance structure is provided, with a helpful organigram. ADRA International's Board of Directors has 42</p>	4



	<p>members who are appointed in five-year cycles. The next cycle will begin in 2020. Are there any guidelines relating to gender, age, geographical representation or skill sets when recruiting new board members? It would be interesting to know the current composition of the Board – this does not seem to be online.</p> <p>The Panel would like to know how ADRA ensures consistency given the high turnover that is expected to happen every five years at the time of new appointments. Also, are there any guidelines on the general size of the board? With 42 board members, the ADRA International board is significantly larger than that of peer organisations – has this posed any challenges to its operation?</p> <p>ADRA's previous report (pp. 4-6) had also provided information on the Network Committee, advisory committees, and sector-specific Technical Learning Labs.</p>	
J2	<p><i>Board oversight of adherence to policies, resource allocation, potential risks, and complaints processes</i></p> <p>It is stated that management reports and independent auditors' reports are used to monitor adherence to policies, and annual budgets and financial statements are used by the Board to monitor resource allocation. Potential risks and complaints are overseen by the Audit Committee and the Board. A Finance Committee had been mentioned previously in the report – what is their role in the above points?</p>	3
J3	<p><i>Complaints handling mechanisms and overview of complaints (external)</i></p> <p>As explained under E1, ADRA establishes complaints and feedback mechanisms within each of its projects. A Complaints Management Committee is formed with a field staff member, the project manager, and the MEAL Officer – the committee decides how to respond to the complaints and feedback that are received.</p> <p>Appendix III of the report includes a detailed example of a complaints mechanism from Yemen, which the Panel appreciates. This includes information on when complaints are gathered, the methods, process and timeframe for handling complaints, and escalation processes. Is there an overarching network-wide complaints mechanism which provides the basis for the individual project mechanisms?</p> <p>While the response does not refer to it, ADRA's Complaints Mechanism Policy – which can be found as Annex 5 of the Protection Policy – provides</p>	2



a comprehensive explanation of the complaints process as it relates to harassment/protection issues, applicable to both internal and external complainants. The policy includes information on how to submit complaints anonymously via the Silent Whistle platform, but there is no information on how to submit a complaint directly to ADRA (e.g. a dedicated email address) – the policy mentions that complaints should be submitted to “the appropriate designated individual,” but that this may be different depending on the country office. The Panel urges ADRA to make this policy easily accessible on its website, in a separate document, so that stakeholders can more easily identify how to file complaints, and provide a clearer channel/point of contact for submission.

This will perhaps be addressed by ADRA's plans to introduce a new external complaints policy. The report explains that there is currently no formal process for handling of other external complaints, but that this deficit has been noted, and outlines key actions to address this in 2019. These include the establishment of a formal policy on external complaints and associated mechanisms, and a contact form on the website where complaints can be made. At the time this report was reviewed (November 2019) these were not yet on the website. We would like to discuss the implementation of these actions in our follow-up call on this feedback letter.

The report states that no external complaints were received in 2018, but notes that this could be due to unclear procedures in complaints filing and/or a lack of formal process to document complaints received.

Finally, the previous report and question J5 of this report refer to a Complaints and Response Mechanism – is this different from the Complaints Mechanism Policy annexed in the Protection Policy? If so, we would like to know what the mechanism covers, and recommend that relevant information be made publicly available. The Panel would appreciate clarification on this.

The Panel appreciates ADRA's efforts to improve on this point, and the complaints mechanism related to protection issues, as well as the example mechanism from Yemen suggests that there is a sound approach in the organisation, but until we have a better idea of how this translates across the network, and until information on complaints mechanisms and submission channels are clearly available online, this remains an area for improvement.



J4	<p>Complaints handling mechanisms and overview of complaints (internal)</p> <p>When it comes to internal complaints, ADRA has contracted a third party, BKD, for its phone and web-based complaint and whistleblower mechanism, IntegraReport. This is primarily for reporting fraud, and is available to all ADRA offices implementing US Government grants (how many offices is this?). Does this mechanism follow the procedure outlined in the Protection Policy? Where can staff find information about the IntegraReport complaints process?</p> <p>ADRA's employees can also use the Silent Whistle hotline which is contracted by the Seventh-day Adventist Church. More information on this is included in the Protection Policy, Annex 5 (Complaints Mechanism Policy). The Panel notes that, as stated under J3, ADRA is planning to create a dedicated Whistleblowing policy, separating this from the general complaints policy. We look forward to an update on this, and believe it will strengthen understanding and accessibility of the mechanism.</p> <p>The report also mentions two email addresses and a phone number which can be used for complaints, and explains that while these are not currently on the website or in the complaints mechanism section of the protection policy, they are planned to be included in both places within 2019.</p> <p>An overview of the five complaints received in 2018 is provided, including the nature of the complaints and explaining that they were dealt with. In future reports, could ADRA also share the outcomes (e.g. disciplinary action, dismissal) and any learnings, such as changes to organisational processes?</p> <p>Whilst there is room for improvement on this issue, the Panel appreciates that ADRA has already made plans to implement changes and ensure its mechanisms are clearer and more accessible. The Secretariat remains at ADRA's disposal if they require any assistance or advice on this.</p>	3
J5	<p>Protecting confidentiality and anonymity of those involved in complaints</p> <p>The report states that the Complaints and Response Mechanism and the Protection Policy both address the need for confidentiality, and how this will be implemented. Key statements from the policies are shared in the report.</p> <p>While there is currently no provision regarding how ADRA might communicate with staff about dismissals due to unacceptable conduct, or pass on relevant information to potential future employers, these issues</p>	3



	<p>have been raised with the HR Unit and are to be addressed during 2019. We look forward to an update in the next report.</p>	
<p>K. Leadership is dedicated to fulfilling the 12 Commitments</p>		
K1	<p><i>The governing body and management are held accountable for fulfilling strategic promises</i></p> <p>The report states that there is no formal mechanism in place to hold ADRA's board and management accountable for meeting strategic promises. These issues will however be discussed at a retreat for Board members and senior staff, to be held in March 2020. Ahead of the retreat, a questionnaire will be sent to all regional offices to collect data on process regarding strategic priorities. The Panel notes this initiative positively. Do such meetings occur regularly?</p> <p>Does this mean that ADRA's President's performance is not addressed? The Panel suggests that it would be good practice for the President to undergo an annual performance review, and this would usually be done by the Board Chair.</p>	2
K2	<p><i>Inclusion of staff in discussing progress toward organisational accountability</i></p> <p>One of the key tenets of ADRA's Accreditation and Learning (AAL) system is accountability, and offices are expected to become more aware of accountability standards and requirements of staff as the system is rolled out. The Panel looks forward to hearing more about this in the next report, and would welcome examples of any particular accountability related issues that were discussed with staff.</p> <p>As for involvement in the Accountable Now reporting process, so far only (ADRA International) staff who have contributed information to the report have been involved. Can ADRA share which positions/teams are included here?</p> <p>There has been limited sharing of the Panel's feedback with staff, and those it was shared with are all at ADRA International. ADRA recognises that significant changes are needed to ensure staff are actively engaged in discussing ADRA's progress on accountability, and believes that the rollout of the AAL will contribute to this. It is stated that the accountability commitments, reporting process, and the Panel's feedback on this report will be circulated to staff. The Panel appreciates ADRA's desire to improve on this point and looks forward to an update in the next report.</p>	2



K3	<p>Scope of this accountability report and influence over national entities</p> <p>The report is submitted by ADRA International on behalf of the ADRA Network of offices, with information drawn from the annual statistical report provided by Country Offices. Some sections, such as the financial statements, only relate to ADRA International.</p> <p>While no reporting on the 12 Accountability Commitments is currently required of Country Offices, this will change as the AAL system is rolled out across the Network throughout 2019-2020. In line with this, a more accurate picture of accountability across the Network is expected in future reports. The Panel commends ADRA on this effort, and its dedication to streamlining accountability throughout the Network in a meaningful way. Once initial results of the AAL are available, we believe this will be a good practice to share with other AN members.</p>	3
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